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**UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF CALIFORNIA  
OAKLAND DIVISION**

SIERRA CLUB, *et al.*,

*Plaintiffs,*

v.

MICHAEL S. REGAN, in his official  
capacity as the Administrator of the  
United States Environmental Protection  
Agency,

*Defendant.*

Civ. No. 4:21-cv-06956 SBA

**STIPULATION AND [PROPOSED]  
ORDER TO ENLARGE TIME FOR  
DEFENDANT’S ANSWER AND TO  
CONTINUE CASE MANAGEMENT  
CONFERENCE**

Plaintiffs Sierra Club, Natural Resources Defense Council, and Environmental Integrity Project and Defendant Michael S. Regan, Administrator of the United States Environmental Protection Agency (collectively, the “Parties”) stipulate as follows:

1. The Parties met and conferred on October 21, 2021. During that meeting, the Parties agreed to pursue settlement options and, in that vein, ask this Court for a 60-day extension.

2. The Parties further agreed that a 60-day extension of litigation proceedings would be beneficial to the Parties and conserve efficient use of the Court’s resources while the Parties seek to negotiate a resolution to this case.

3. There have been no previous time modifications in this case.

4. Plaintiffs filed their complaint on September 8, 2021 and completed service on September 9, 2021, such that Defendant’s response is currently due on November 8, 2021. Dkt. No. 17. A 60-day extension would change Defendant’s response deadline to January 7, 2022.

5. This Court set November 24, 2021 as the last day to meet and confer regarding initial disclosures, early settlement, ADR process selection, and a discovery plan. Dkt. No. 5. A 60-day extension would change this deadline to January 24, 2022.

1           6. This Court set December 8, 2021 as the deadline to file a Rule 26(f) Report, complete  
2 initial disclosures or state an objection in a Rule 26(f) Report, and file a Case Management  
3 Statement. *Id.* A 60-day extension would change this deadline to February 7, 2022.

4           7. The Case Management Conference for this case is currently scheduled for December  
5 16, 2021 at 2:45 P.M. Dkt. No. 15. The Parties request that the Court reschedule this  
6 Conference for Thursday, February 17, 2022.

7           8. The Parties respectfully request this Court enter this stipulation and extend all  
8 litigation deadlines for 60 days as outlined above, and to continue the Case Management  
9 Conference until Thursday, February 17, 2022, or at such later time as is convenient for the  
10 Court.

11           9. Pursuant to Local Civil Rule 5-1(h)(3), the undersigned counsel for Defendant attests  
12 that the other signatories listed below concur in the filing of this document.

13  
14 Dated: November 3, 2021

15 s/ Andrew Coghlan  
16 Andrew Coghlan (SBN **313332**)  
17 United States Department of Justice  
18 Environment and Natural Resources Division  
19 150 M Street, N.E.  
20 Washington, D.C. 20002  
21 Tel: (202) 514-9275  
22 andrew.coghlan@usdoj.gov

23 *Counsel for Defendant*

24 s/ Louisa Eberle  
25 Louisa Eberle (SBN **320803**)  
26 Sierra Club  
27 1536 Wynkoop Street, Suite 200  
28 Denver, CO 80202  
Tel: (415) 977-5765  
louisa.eberle@sierraclub.org

s/ Andrea Issod  
Andrea Issod (SBN **230920**)  
Sierra Club  
2101 Webster Street, Suite 1300

Respectfully submitted,

s/ Emily Davis  
Emily Davis (SBN **314152**)  
Natural Resources Defense Council  
111 Sutter Street, 21<sup>st</sup> Floor  
San Francisco, CA 94104  
Tel: (415) 875-6100  
edavis@nrdc.org

*Counsel for Plaintiff Natural Resources  
Defense Council*

s/ Patton Dycus  
Patton Dycus (*pro hac vice*)  
Environmental Integrity Project  
315 W. Ponce de Leon Avenue, Suite 842  
Decatur, GA 30030  
Tel: (404) 446-6661  
pdycus@environmentalintegrity.org

*Counsel for Plaintiff Environmental  
Integrity Project*

1 Oakland, CA 94612  
2 Tel: (415) 977-5544  
3 andrea.issod@sierraclub.org

4 *Counsel for Plaintiff Sierra Club*

5 \* \* \*

6 **PURSUANT TO STIPULATION, IT IS SO ORDERED.**

7 DATED:

8 SAUNDRA B. ARMSTRONG  
9 United States District Judge